

**Commonwealth of Kentucky
Environmental and Public Protection Cabinet
Department for Environmental Protection
Division for Air Quality
803 Schenkel Lane
Frankfort, Kentucky 40601
(502) 573-3382**

**AIR QUALITY PERMIT
Issued under 401 KAR 52:040**

Permittee Name: Woodcraft Industries Incorporated
Mailing Address: 525 Lincoln Avenue, SE, St. Cloud, MN 56308

Source Name: Woodcraft Industries Incorporated
Mailing Address: 434 Scotty's Way
Bowling Green, KY 42103

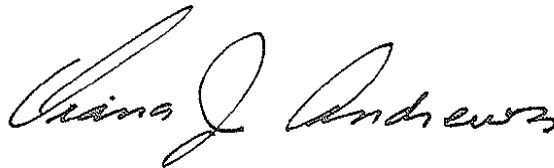
Source Location: Same as above

Permit ID: S-07-071
Agency Interest #: 4149
Activity ID: APE20050001
Review Type: Minor Source, Operating
Source ID: 21-227-00109

Regional Office: Bowling Green Regional Office
1508 Westen Avenue
Bowling Green, KY 42104
(270) 746-7475

County: Warren

Application
Complete Date: May 30, 2005
Issuance Date: May 31, 2007
Revision Date: N/A
Expiration Date: May 31, 2017



**John S. Lyons, Director
Division for Air Quality**

SECTION A - PERMIT AUTHORIZATION

Pursuant to a duly submitted application the Kentucky Division for Air Quality hereby authorizes the operation of the equipment described herein in accordance with the terms and conditions of this permit. This permit has been issued under the provisions of Kentucky Revised Statutes Chapter 224 and regulations promulgated pursuant thereto.

The permittee shall not construct, reconstruct, or modify any affected facilities without first submitting a complete application and receiving a permit for the planned activity from the permitting authority, except as provided in this permit or in 401 KAR 52:040, State-origin permits.

Issuance of this permit does not relieve the permittee from the responsibility of obtaining other permits, licenses, or approvals that may be required by the Cabinet or other federal, state, or local agencies.

SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS

Emission Unit 01 (01) Wood Processing Equipment (Rough Mill)

Emission Unit 03 (03) Boiler Fuel Bin Loading

Emission Unit 04 (TL) Truck Loadout

Description:

Emission Unit ID	Description	Maximum Capacity	Construction Date
01 (01)	Wood Processing Equipment (Rough Mill)		Aug 1994
	Batch Operation: Various saws, planers, chop saws, mills, drill presses, band saws, lathes and molders (with Process Filtration Device)	<u>Throughput Rate:</u> 9.6 ton/hr	
03 (3)	Boiler Fuel Bin Loading		Aug 1994
	Storage Silo for Wood Waste (with Process Filtration Device)	<u>Throughput Rate:</u> 1.5 ton/hr	
04 (TL)	Truck Loadout		Aug 1994
	Tractor Trailers with vent controls for bulk loading of Wood Waste (with Process Filtration Device)	<u>Throughput Rate:</u> 1.1 ton/hr	

Note: Filtration Devices Inherent to Process (No Controls)

APPLICABLE REGULATIONS:

401 KAR 59:010, *New process operations*, applicable to emission units commenced on or after July 2, 1975.

1. **Operating Limitations:** None

2. **Emission Limitations:**

- a. The following emission limitations for particulate matter are pursuant to regulation 401 KAR 59:010, Section 3 (2):

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

EMISSION POINT	AFFECTED FACILITY	MAXIMUM CAPACITY (ton/hr)	MAXIMUM ALLOWABLE EMISSION RATE (lb/hr)
01 (01)	Wood Processing Equipment (Rough Miller)	9.6	14.59
03 (03)	Boiler Fuel Bin Loading	1.5	4.62
04 (TL)	Truck Loadout	1.1	3.81

Emission of particulate matter from a control device or stack of any affected facility up to a process rate of 1000 lbs/hr shall not exceed **2.34** lbs/hr and from 1000 lbs/hr up to 60,000 lbs/hr, emissions shall be accomplished by the following equation:

$$E = 3.59(P)^{0.62}$$

E = the PM emissions rate (pounds/hour)

P = the process rate (tons/hour)

- b. The opacity of visible emissions from each stack shall not equal or exceed 20 percent [401 KAR 59:010, Section 3 (1)].

Compliance Demonstration Method:

- a. Mass Emission Standard:

EMISSION POINT	AFFECTED FACILITY	MAXIMUM ALLOWABLE EMISSION RATE (lb/hr)	MAXIMUM UNCONTROLLED EMISSION RATE (lb/hr)
01 (01)	Wood Processing Equipment (Rough Miller)	14.59	9.60
03 (03)	Boiler Fuel Bin Loading	4.62	1.50
04 (TL)	Truck Loadout	3.81	1.10

- b. See monitoring requirements for opacity compliance.

3. Testing Requirements: None

4. Monitoring Requirements:

- a. See Section C, General Condition 6.a.
- b. The permittee shall perform a qualitative visual observation of the opacity of emissions from each stack at least once per week. If visible emissions are seen, the permittee shall perform an EPA Reference Method 9 test for opacity on the applicable stack emission within 24 hours of observing visible emissions and make any necessary repairs to bring the opacity into compliance.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

5. Recordkeeping Requirements:

- a. See Section C, General Condition 2.a, 2.b and 6.a.
- b. Records shall be maintained of the visual observations of stack emissions, any EPA Reference Method 9 test performed, and any necessary repairs made as a result of not meeting an emission limitation.

6. Reporting Requirements:

See Section C, General Condition 3.a, 3.b and 6.b.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Emission Unit 02 (02) Wood-Fired Indirect Heat Exchanger

Description:

Emission Unit ID	Description	Maximum Capacity	Control Device	Construction Date
02 (02)	Wood-Fired Boiler	<u>Throughput Rate:</u> 1.476 ton/hr	Centrifugal Multi-Clone Efficiency: 90 %	Aug 1994
	Hurst Boiler HYB-500-15 Heat Capacity: 22 mmBtu/hr Primary Fuel: Wood Waste			

APPLICABLE REGULATIONS:

401 KAR 59:015, *New indirect heat exchangers*, applicable to an emission unit with a capacity less than 250 mmBtu per hour and commenced on or after April 9, 1972.

401 KAR 60:005, incorporating by reference 40 CFR 60, Subpart Dc, *Standards of performance for small industrial-commercial-institutional steam generating units*, for units less than or equal to 100 mmBtu per hour but greater than or equal to 10 mmBtu per hour and commenced after June 9, 1989.

1. **Operating Limitations:** None

2. **Emission Limitations:**

- a. Pursuant to 401 KAR 59:015, Section 4 (1)(c), particulate emissions shall not exceed 0.464 lb/mmBtu based on a three-hour average.
- b. Pursuant to 401 KAR 59:015, Section 4 (2), emissions shall not exceed 20% opacity based on a six-minute average, except that a maximum of 40% opacity based on a six-minute average, shall be permissible for not more than six consecutive minutes in any sixty minutes during cleaning the firebox or blowing soot.
- c. Pursuant to 401 KAR 59:015, Section 5 (1)(c), sulfur dioxide emissions shall not exceed 3.52 lb/mmBtu based on a twenty-four-hour average while burning wood.

Compliance Demonstration Method:

- a. Compliance with the particulate emission limit is demonstrated when burning wood waste, based on AP-42, Table 1.6-1 emission factor of 0.56 lbs/mmBtu and proper operation of the centrifugal multi-clone (efficiency of 90 %). Refer to Subsection 4. **Monitoring Requirements** for visual observation of emissions.

- b. Compliance with the sulfur dioxide limit is demonstrated when burning wood waste, based on AP-42, Table 1.6-2 emission factor of 0.025 lbs/mmBtu.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

- c. For compliance with the opacity limit refer to Subsection 4. **Monitoring Requirements.**
- 3. **Testing Requirements:**
The permittee shall determine the opacity of emissions from the stack using U.S. EPA Reference Method 9 when requested by the Division.
- 4. **Monitoring Requirements:**
The permittee shall perform a qualitative visual observation of the opacity of emissions from each stack at least once per week. If visible emissions are seen, the permittee shall perform an EPA Reference Method 9 test for opacity on the applicable stack emission within 24 hours of observing visible emissions and make any necessary repairs to bring the opacity into compliance.
- 5. **Recordkeeping Requirements:**
 - a. Records shall be maintained of the visual observations of stack emissions, any EPA Reference Method 9 test performed, and any necessary repairs made as a result of not meeting an emission limitation.
 - b. The permittee shall maintain daily records of the amount of wood and natural gas combusted by the boiler, in accordance with 40 CFR 60, Subpart Dc.
- 6. **Reporting Requirements:**
See Section C, General Condition 3.a, 3.b and 6.b.

SECTION C - GENERAL CONDITIONS

1. Administrative Requirements

- a. The permittee shall comply with all conditions of this permit. Noncompliance shall be a violation of 401 KAR 52:040, Section 3(1)(b) and is grounds for enforcement action including but not limited to the termination, revocation and reissuance, or revision of this permit.
- b. This permit shall remain in effect for a fixed term of ten (10) years following the original date of issue. Permit expiration shall terminate the source's right to operate unless a timely and complete renewal application has been submitted to the Division at least six months prior to the expiration date of the permit. Upon a timely and complete submittal, the authorization to operate within the terms and conditions of this permit, including any permit shield, shall remain in effect beyond the expiration date, until the renewal permit is issued or denied by the Division. [401 KAR 52:040, Section 15]
- c. Any condition or portion of this permit, which becomes suspended or is ruled invalid as a result of any legal or other action should not invalidate any other portion or condition of this permit [Section 1a-11 of the *Cabinet Provisions and Procedures for Issuing State-Origin Permits* incorporated by reference in 401 KAR 52:040 Section 23].
- d. Pursuant to materials incorporated by reference by 401 KAR 52:040, this permit may be revised, revoked, reopened, reissued, or terminated for cause. The filing of a request by the permittee for any permit revision, revocation, reissuance, or termination, or of a notification of a planned change or anticipated noncompliance shall not stay any permit condition [Section 1a-4, 5, of the *Cabinet Provisions and Procedures for Issuing State-Origin Permits* incorporated by reference in 401 KAR 52:040 Section 23].
- e. This permit does not convey property rights or exclusive privileges [Section 1a-8 of the *Cabinet Provisions and Procedures for Issuing State-Origin Permits* incorporated by reference in 401 KAR 52:040 Section 23].
- f. Nothing in this permit shall alter or affect the liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance [401 KAR 52:040 Section 11(3)].
- g. This permit shall be subject to suspension at any time the permittee fails to pay all fees within 90 days after notification as specified in 401 KAR 50:038, Air emissions fee. The permittee shall submit an annual emissions certification pursuant to 401 KAR 52:040, Section 20.
- h. All previously issued permits to this source at this location are hereby null and void.

SECTION C - GENERAL CONDITIONS (CONTINUED)**2. Recordkeeping Requirements**

- a. Records of all required monitoring data and support information, including calibrations, maintenance records, and original strip chart recordings, and copies of all reports required by the Division for Air Quality, shall be retained by the permittee for a period of at least five years and shall be made available for inspection upon request by any duly authorized representative of the Division for Air Quality [401 KAR 52:040 Section 3(1)(f) and Section 1b-IV-2 of the *Cabinet Provisions and Procedures for Issuing State-Origin Permits* incorporated by reference in 401 KAR 52:040 Section 23].
- b. The permittee shall perform compliance certification and recordkeeping sufficient to assure compliance with the terms and conditions of the permit. Documents, including reports, shall be certified by a responsible official pursuant to 401 KAR 52:040, Section 21.

3. Reporting Requirements

- a. (1) In accordance with the provisions of 401 KAR 50:055, Section 1, the permittee shall notify the Regional Office listed on the front of this permit concerning startups, shutdowns, or malfunctions as follows:
 - i. When emissions during any planned shutdowns and ensuing startups will exceed the standards, notification shall be made no later than three (3) days before the planned shutdown, or immediately following the decision to shut down, if the shutdown is due to events which could not have been foreseen three (3) days before the shutdown.
 - ii. When emissions due to malfunctions, unplanned shutdowns and ensuing startups are or may be in excess of the standards, notification shall be made as promptly as possible by telephone (or other electronic media) and shall be submitted in writing upon request.
- (2) The permittee shall promptly report deviations from permit requirements including those attributed to upset conditions (other than emission exceedances covered by Reporting Requirement condition a.(1) above), the probable cause of the deviation, and corrective or preventive measures taken; to the Regional Office listed on the front of this permit within 30 days. Other deviations from permit requirements shall be included in the semiannual report [Section 1b-V-3 of the *Cabinet Provisions and Procedures for Issuing State-Origin Permits* incorporated by reference in 401 KAR 52:040 Section 23].
- b. The permittee shall furnish information requested by the Cabinet to determine if cause exists for modifying, revoking and reissuing, or terminating the permit; or to determine compliance with the permit [Section 1a-6 of the *Cabinet Provisions and Procedures for Issuing State-Origin Permits* incorporated by reference in 401 KAR 52:040 Section 23].
- c. Summary reports of monitoring required by this permit shall be submitted to the Regional Office listed on the front of this permit at least every six (6) months during the life of this permit. For emission units that were still under construction or which had not commenced operation at the end of the 6-month period covered by the report and are subject to monitoring requirements in this permit, the report shall indicate that no monitoring was performed during the previous six months because the emission unit was not in operation. The summary reports

SECTION C - GENERAL CONDITIONS (CONTINUED)

are due January 30th and July 30th of each year. All deviations from permit requirements shall be clearly identified in the reports. All reports shall be certified by a responsible official pursuant to 401 KAR 52:040, Section 21.

4. Inspections

In accordance with the requirements of 401 KAR 52:040, Section 3(1)(f) the permittee shall allow authorized representatives of the Cabinet to perform the following during reasonable times. Reasonable times are defined as during all hours of operation, during normal office hours; or during an emergency:

- a. Enter upon the premises to inspect any facility, equipment (including air pollution control equipment), practice, or operation.
- b. To access and copy any records required by the permit.
- c. Inspect, at reasonable times, any facilities, equipment (including monitoring and pollution control equipment), practices, or operations required by the permit.
- d. Sample or monitor, at reasonable times, substances or parameters to assure compliance with the permit or any applicable requirements.

5. Emergencies/Enforcement Provisions

- a. The permittee shall not use as defense in an enforcement action, the contention that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance [Section 1a-3 of the *Cabinet Provisions and Procedures for Issuing State-Origin Permits* incorporated by reference in 401 KAR 52:040 Section 23].
- b. An emergency shall constitute an affirmative defense to an action brought for the noncompliance with the technology-based emission limitations if the permittee demonstrates through properly signed contemporaneous operating logs or relevant evidence that:
 - (1) An emergency occurred and the permittee can identify the cause of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During an emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit; and
 - (4) The permittee notified the Division as promptly as possible and submitted written notice of the emergency to the Division within two working days after the time when emission limitations were exceeded due to the emergency and included a description of the emergency, steps taken to mitigate emissions, and corrective actions taken.
- c. Emergency provisions listed in General Condition 5.b are in addition to any emergency or upset provision contained in an applicable requirement [401 KAR 52:040, Section 22(1)].
- d. In an enforcement proceeding, the permittee seeking to establish the occurrence of an emergency shall have the burden of proof. [401 KAR 52:040, Section 22(2)].

SECTION C - GENERAL CONDITIONS (CONTINUED)**6. Compliance**

- a. Periodic testing or instrumental or non-instrumental monitoring, which may consist of record keeping, shall be performed to the extent necessary to yield reliable data for purposes of demonstration of continuing compliance with the conditions of this permit. For the purpose of demonstration of continuing compliance, the following guidelines shall be followed:
 - (1) Pursuant to 401 KAR 50:055, General compliance requirements, Section 2(5), all air pollution control equipment and all pollution control measures proposed by the application in response to which this permit is issued shall be in place, properly maintained, and in operation at any time an affected facility for which the equipment and measures are designed is operated, except as provided by 401 KAR 50:055, Section 1.
 - (2) All the air pollution control systems shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers. A log shall be kept of all routine and nonroutine maintenance performed on each control device. Daily observations are required during daylight hours of all operations, control equipment and any visible emissions to determine whether conditions appear to be either normal or abnormal. If the operations, controls and/or emissions appear to be abnormal, the permittee must then comply with the requirements of Section C – General Conditions, 3.a.(2), of this permit.
 - (3) A log of the monthly raw material consumption and monthly production rates shall be kept available at the facility. Compliance with the emission limits may be demonstrated by computer program, spread sheets, calculations or performance tests as may be specified by the Division [401 KAR 50:055, Section 2].
- b. Pursuant to 401 KAR 52:040, Section 19, the permittee shall certify compliance with the terms and conditions contained in this permit by January 30th of each year, by completing and returning a Compliance Certification Form (DEP 7007CC) (or an approved alternative) to the Regional Office listed on the front of this permit in accordance with the following requirements:
 - (1) Identification of the term or condition;
 - (2) Compliance status of each term or condition of the permit;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The method used for determining the compliance status for the source, currently and over the reporting period, and
 - (5) For an emissions unit that was still under construction or which has not commenced operation at the end of the 12-month period covered by the annual compliance certification, the permittee shall indicate that the unit is under construction and that compliance with any applicable requirements will be demonstrated within the timeframes specified in the permit.

SECTION C - GENERAL CONDITIONS (CONTINUED)

- (6) The certification shall be postmarked by January 30th of each year. Annual compliance certifications shall be mailed to the following addresses:

Division for Air Quality	Division for Air Quality
Bowling Green Regional Office	Central Files
1508 Westen Avenue	803 Schenkel Lane
Bowling Green, KY 42104	Frankfort, KY 40601-1403

- c. Permit Shield - A permit shield shall not protect the owner or operator from enforcement actions for violating an applicable requirement prior to or at the time of permit issuance. Compliance with the conditions of this permit shall be considered compliance with all:
- (1) Applicable requirements that are included and specifically identified in this permit; or
 - (2) Non-applicable requirements expressly identified in this permit [401 KAR 52:040, Section 11].

SECTION D - INSIGNIFICANT ACTIVITIES

The following listed activities have been determined to be insignificant activities for this source pursuant to 401 KAR 52:040, Section 6. While these activities are designated as insignificant the permittee shall comply with the applicable regulation and any level of periodic monitoring specified below.

<u>Description</u>	<u>Generally Applicable Regulation</u>
1. Stacking Machine	401 KAR 59:010
2. Blow Box	401 KAR 59:010
3. Fork Lifts (8)	None
4. Genie Boom	None
5. Air Compressors (4)	None
6. Kiln 1-5	401 KAR 59:010
7. Pre-Dryers (2)	401 KAR 59:010
8. Gluer Auto (2)	401 KAR 59:010
9. Gluer Manual	401 KAR 59:010
10. Spark Arrestors	None
11. Welder	None
12. Stretch Wrap Machine	401 KAR 59:010
13. Yard Tractor	None